

***Exhibit N***

**Shirley Gibson**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF MONTANA  
3                   BILLINGS DIVISION  
4       TRACY CAEKAERT, and  
5       CAMILLIA MAPLEY,  
6                   Plaintiffs,                   Case No. CV-20-52-BLG-SPW  
7               vs.  
8       WATCHTOWER BIBLE AND TRACT  
9       SOCIETY OF NEW YORK, INC.,  
10      WATCH TOWER BIBLE AND  
11      TRACT SOCIETY OF  
12      PENNSYLVANIA, and BRUCE  
13      MAPLEY SR.,  
14                   Defendants.  
15      WATCHTOWER BIBLE AND TRACT  
16      SOCIETY OF NEW YORK, INC.,  
17                   Cross Claimant,  
18      BRUCE MAPLEY, SR.,  
19                   Cross Defendant.  
20      \_\_\_\_\_  
21      ARIANE ROWLAND, and JAMIE  
22      SCHULZE                   Cause No. CV 20-59-BLG-SPW  
23                   Plaintiff,  
24               vs.  
25      WATCHTOWER BIBLE AND TRACT

**Shirley Gibson**

1 SOCIETY OF NEW YORK, INC.  
2 and WATCH TOWER BIBLE AND  
3 TRACT SOCIETY OF  
4 PENNSYLVANIA,  
5 Defendants.

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8  
9 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION  
10 UPON ORAL EXAMINATION OF  
11 SHIRLEY GIBSON  
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13 BE IT REMEMBERED, that the  
14 videoconference/videotaped deposition upon oral  
15 examination of Shirley Gibson, appearing at the  
16 instance of the Plaintiffs, was taken at 800 North  
17 Last Chance Gulch, Suite 101, Helena, Montana, on  
18 Thursday, April 14, 2022, beginning at the hour of  
19 9:07 a.m., pursuant to the Federal Rules of Civil  
20 Procedure, before Mary R. Sullivan, Registered  
21 Merit Reporter, Certified Realtime Reporter, and  
22 Notary Public.  
23  
24  
25

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1 A. (Nods head.)

2 Q. And then Helena.

3 A. Yes.

4 Q. Which -- Which Kingdom Hall is in Helena?

5 A. I'm in Canyon Ferry congregation.

6 Q. Okay. And have you been a member of  
7 other congregations in Helena?

8 A. No.

9 Q. Just that one?

10 A. Just that one.

11 Q. Okay. And is that the full list of the  
12 congregations where you've served as a member?

13 A. All the -- All those places that I've  
14 been.

15 Q. Yeah.

16 A. In Helena, this is the only one, yeah.

17 Q. Okay. All right.

18 Let's talk about paragraph 3 of your  
19 affidavit. The first sentence you state that  
20 Bruce, Sr. was a pedophile who started molesting  
21 Tracy when she was four. And then you say [As  
22 Read]: "This came out in 1977 when we learned that  
23 another Ministerial Servant in the Hardin  
24 congregation, Gunner Hain, had sexually molested  
25 Tracy at his home."

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1 A. Yes.

2 Q. Why do you say 1977? You fairly -- How  
3 do you feel about that number, that year? Pretty  
4 certain about that?

5 A. Yes.

6 Q. Tell me why.

7 A. Because it was brought to my attention  
8 all this stuff had happened, and I --

9 Q. How -- How was it brought your attention?

10 A. Well, because of Gunner Hain, it came  
11 out. He was reprovved, but they didn't do anything  
12 to Bruce 'cause he -- Anyway. I was told what had  
13 happened, and then Bruce admitted he had too,  
14 so -- but they didn't do anything with Bruce but  
15 they did something -- they -- Gunner Hain was  
16 reprovved is all.

17 Q. Who told you that?

18 A. Harold Rimby.

19 Q. And so when you say this came out in  
20 1977, that -- that -- Harold Rimby told you  
21 personally --

22 A. Yes.

23 Q. -- about Gunner Hain.

24 A. And my ex-husband.

25 Q. And your ex-husband molesting Gunner's

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1 stepdaughter. Gunner had molested his  
2 stepdaughter and Tracy.

3 A. (Nods head.)

4 Q. How did Mr. Rimby know that?

5 MR. SWEENEY: Objection. Speculation.

6 A. Do I still answer?

7 BY MR. SHAFFER:

8 Q. Yeah, go ahead. Yeah.

9 A. Well, because Gunner told Harold.

10 Q. And then Harold told you.

11 A. Yes.

12 Q. Okay. Sounds like Harold told you about  
13 Gunner. Did -- In -- In the same conversation he  
14 told you that Bruce had done the same thing?

15 A. Yes.

16 Q. And do you know how Harold knew  
17 that -- that Bruce had molested Tracy?

18 MR. SWEENEY: Objection. Speculation.

19 BY MR. SHAFFER:

20 Q. Go ahead. It's okay.

21 A. Well, Bruce admitted to Harold that he  
22 had.

23 Q. Okay. And then Harold told you.

24 A. Yes.

25 Q. Okay. In 1977 -- Why do you say 1977 as

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1     opposed to 1978?

2           A.     Because it was the year after we were  
3     baptized.

4           Q.     Okay. So you feel -- you're certain  
5     about that number, 1977.

6           A.     (Nods head.)

7           Q.     Yeah. Where were you when you had this  
8     conversation with Mr. Rimby?

9           A.     In our home at Fort Smith.

10          Q.     Who else was there?

11          A.     My ex-husband.

12          Q.     So just the three of you?

13          A.     Yeah. Well, my children were there, too.

14          Q.     Okay. And had Mr. Rimby announced he was  
15     going to come over to have this conversation with  
16     you or did he just show up, or how'd that happen?

17          A.     I guess just showed up. I don't  
18     remember. We didn't make announcements; we just  
19     came --

20          Q.     Okay.

21          A.     -- to each other's homes.

22          Q.     I take it it was a surprise. It was  
23     shocking.

24          A.     Yes.

25          Q.     Is that fair?

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1           A.     And the first thing I said was "We need  
2     to call the authorities."

3                     And Harold said, "I'll take care of it."

4           Q.     Okay.

5           A.     So I assumed he would, but he didn't.

6           Q.     Okay.

7           A.     I mean, maybe he did. He didn't call the  
8     authorities, though. And that was my mistake.

9           Q.     Was Harold an elder at that point?

10          A.     Yes.

11          Q.     And you're new to the church at that  
12     point in time.

13          A.     Yes.

14          Q.     You understood that if Harold -- Harold  
15     was essentially directing how to take care of this  
16     situation. Is that right?

17          A.     Yes.

18          Q.     And would there be a consequence to you  
19     as a member if you did -- if you disobeyed  
20     Mr. Rimby's command to not tell the authorities?

21          A.     No, there wouldn't have been a problem.  
22     I just assumed he was going to do it. He said he  
23     was.

24          Q.     He said he was going to tell the  
25     authorities or he was going to handle it?



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1 Q. Okay. Who -- Can you identify other  
2 people who knew about it by name?

3 A. Martin Svenson, James Rowland,  
4 Joyce Hains, June Rimby. All deceased now.

5 Q. Mm-hmm. Anyone else that you know that  
6 knew about it?

7 A. No.

8 Q. Were you permitted to tell people about  
9 it?

10 A. I could have, but I didn't.

11 Q. Okay. So you understood that you could,  
12 you could have gone to the authorities or you  
13 could have told people about it, but you didn't.

14 A. Yes.

15 Q. You chose not to.

16 A. I chose not to.

17 Q. Okay.

18 A. It was a mistake.

19 Q. Sorry?

20 A. Was a mistake.

21 Q. Okay. And had you ever been taught as a  
22 member of the church that the elders direct how to  
23 handle situations like wrongdoing within the  
24 congregation?

25 A. Yes.

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1 Q. Okay. Tell me about that. When were you  
2 taught that?

3 A. I suppose during my studies. I  
4 don't -- I don't remember where I learned it. I  
5 mean, it's just something we do.

6 Q. How was it supposed to work, then? So  
7 there's -- there's alleged wrongdoing in the  
8 church. How is it supposed to work? What are --  
9 What are you supposed to do with that information?

10 A. Okay. You go to the elders.

11 Q. Okay.

12 A. You have a sit-down with them, tell them  
13 the situation, and they take care of it.

14 Q. And they're in charge of handling that,  
15 right, at that point?

16 A. Yes.

17 Q. It's out of your hands.

18 A. Yes.

19 Q. Okay.

20 A. Well, I mean, unless they need more  
21 information.

22 Q. Okay. And is there a process that the  
23 elders are supposed to use to determine if  
24 wrongdoing has occurred?

25 A. I don't know how they handle it. I know

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1 they discuss it, and I don't -- I don't know.

2 Q. Yeah. Right. Is it a process, though,  
3 that as a member you've -- you come to trust this  
4 process, you're taught this process if there's  
5 wrongdoing, you take it to an elder and you trust  
6 it's going to be handled. Right?

7 A. Yes.

8 Q. Okay. And that's what you're taught as a  
9 member.

10 A. Yes.

11 Q. Okay. Did you know Mr. Hain?

12 A. Yes, I did.

13 Q. And did he voluntarily go to Mr. Rimby  
14 and the elders to say, "Hey," --

15 A. I have no idea.

16 Q. -- "I molested" --

17 A. I never asked.

18 Q. So you don't know how that came about.

19 A. Hm-mmm.

20 Q. And do you know what brought about  
21 Bruce's decision to tell Mr. Rimby that he had  
22 been molesting Tracy?

23 A. I don't know what his reason was.  
24 Probably because he'd molested other girls, too,  
25 so -- I don't know that for sure, but...

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1 A. So how could we control --

2 Q. Sure.

3 A. -- what he did?

4 Q. Sure. Yeah.

5 A. I don't think the organization should be  
6 responsible for somebody's conduct.

7 Q. I understand, yeah.

8 Do you know what Mr. Rimby did, if  
9 anything?

10 A. No, I do not.

11 Q. So you don't know if he did anything with  
12 the information you gave him.

13 A. No.

14 Q. But you did trust that was the proper way  
15 to handle it. Correct?

16 A. Yes.

17 Q. Okay. Tell me about that. Why did you  
18 trust that that was the proper way to handle it?

19 A. Well, because Jehovah has an  
20 organization. He's appointed men to shepherd our  
21 congregation, take care of us.

22 Q. Those men being the elders.

23 A. Yes.

24 Q. In your experience with the church, have  
25 you -- have you been able to observe how members